



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

NOV 10 2004

Ms. Mary Lou Capichioni  
Director  
Remediation Services  
Corporate Environmental Services  
The Sherwin-Williams Company  
101 Prospect Avenue, N.W.  
Cleveland, OH 44115-1075

Re: Comments on the Sherwin-Williams August 16, 2004, Remedial Investigation Work Plan Implementation Sequence (Implementation Strategy); Gibbsboro, NJ

Dear Ms. Capichioni:

The U.S. Environmental Protection Agency (EPA) has reviewed the August 16, 2004 Remedial Investigation Work Plan Implementation Sequence (Implementation Strategy) submitted by Sherwin-Williams and has the following comments enclosed with this letter. EPA's comments include revised sample locations (enclosed as amended figures) from those proposed by Sherwin Williams, and in some cases (e.g. Hilliards Creek) additional sample locations than proposed in the Implementation Strategy are indicated in order to ensure that adequate data is collected to meet the objectives of the Implementation Strategy.

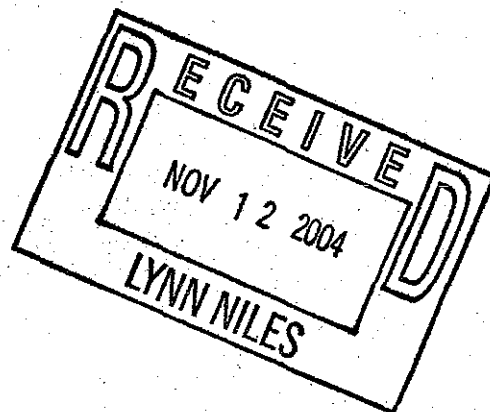
As indicated in the August 16, 2004 Sherwin Williams correspondence to EPA, the Implementation Strategy will not modify the requirements of the approved RI/FS Work Plan (November 2003 Work Plan).

Please contact Mr. Ray Klimcsak, of my staff, at (212) 637- 3916 if you have any questions or concerns.

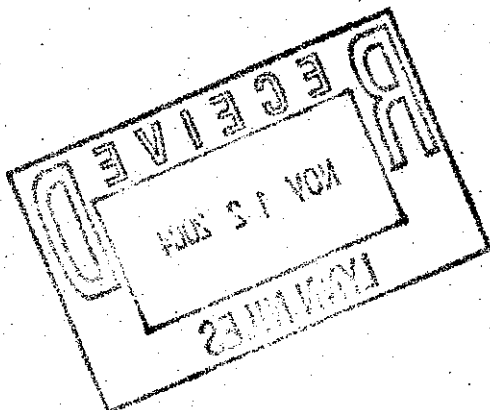
Sincerely yours,

Carole Petersen, Chief  
New Jersey Remediation Branch

Enclosures



cc: Allen Danzig, Esq., SWC w/encls.  
John Gerulis, SWC w/encls.  
Daniel Kopcow, Weston w/encls.  
John Doyon, NJDEP w/encls.  
Hank Martin, ELM w/encls.  
Susanne Peticolas, Gibbons, Del Deo, Dolan, Griffinger, & Vecchione w/encls.  
Lynn Arabia, TtFWI w/encls.



## **Comments on the August, 2004 Remedial Investigation Work Plan Implementation Sequence (Implementation Strategy)**

### **1. Background**

- a. **"COCs" clarification of terminology, page 2** - The term "chemical of concern" (COCs) is used throughout the text (beginning in the Background Section page 2,) within the Implementation Strategy. It should be noted that this term is typically used to identify the chemicals which are risk drivers; that is, those chemicals which are associated with cancer risks in excess of E-06 or non-cancer hazards greater than 1. Since the baseline human health risks assessment has not yet been completed and the COCs have not been identified, the appropriate term for use is "chemical of potential concern"(COPCs). This term is applied to chemicals which exceed some risk-based concentration and therefore require additional evaluation.

### **2. Overview**

- a. **Page 3** - It is stated that after the initial sequence of sampling (i.e., the full implementation of the CSM), it is the intent of Sherwin-Williams to return to the Dump Site and complete the additional characterization activities within the site and on the adjacent properties. The elements of this characterization and the specific adjacent properties should be specified.
- b. **Page 3** - It is stated that a limited number of samples will be collected during Phase I of the Implementation Strategy. However, SW has also stated that the remainder of the samples proposed in the approved RI/FS Work Plan, will be collected in the future. It should be pointed out that the terms/conditions for additional sampling (for either full analysis or "refined") or no further sampling have not been provided. If there is a statistical approach for how SW may support their claim to limit the "COPCs" or the collection of samples (as a result of the Phase I sampling event) the details of the program should be identified.

### **3. Conceptual Site Model (CSM)**

- a. **Conceptual Site Model. Page 4** - An example for how the CSM may work is provided. It is stated that sampling may initially occur at the Route 561 Dump Site, to better define what is present in White Sands Branch (ultimately obtaining a list of potential "COPCs"). Afterwards, based on the results of samples collected from within the Dump Site, a limited sampling event would occur in the White Sands Branch (WSB) area to validate the CSM. It is worth mentioning that the rationale for potentially limiting the analysis of constituents is only applicable for the example discussed above. It may be possible that the constituents present within the Dump Site may be

the only constituents present within WSB. However, as WSB enters the Burn Site, a whole new list of constituents may be present and can no longer be limited to what was found at the Dump Site. Sherwin-Williams has briefly alluded to this fact on Figure 1, here it is stated that "some" sites/areas (i.e., all of the remaining) require a separate conceptual model diagram. This may be attributed to the fact that all of the remaining sites/areas have the very high likelihood of "containing/ possessing" their own list (source of) constituents; and therefore, samples collected should not be analyzed for constituents in a "limited" sense. Finally, it is important to note that due to off-site migration through run-off or groundwater migration, particular constituents on the Dump site may not be present within WSB.

- b. Conceptual Site Model Figure 1 - The rationale for why "reservoir outfall" is depicted as a mode of transportation which may occur at Silver Lake and Clement Lake, but not Bridgewood Lake and Kirkwood Lake, must be presented.

Additionally, the rationale for why Bridgewood and Kirkwood Lake are believed to be "sinks" and that no movement of COPCs will occur should be explained in further detail. The depths within Bridgewood Lake do not exempt them from the fact that heavy rains could cause the transfer of both water and sediment from the lakes to other areas. In addition, it should be pointed out that previous sampling has shown lead concentrations - over 400 ppm in the stream from Bridgewood Lake's outfall point (on W. Clementon Rd.) to where it meets up with Hilliard Creek.

- c. Conceptual Site Model Figure 1 The rationale for why groundwater is not depicted on the CSM as a mode of constituent migration/transfer from Hilliard Creek (headwaters and downstream) to both the Braided Stream and Kirkwood Lake, must be provided.
- d. Conceptual Site Model Figure 1 According to the CSM it appears that the following modes of constituent transfer/migration may or may not occur within Bridgewood Lake:
- i. Groundwater may potentially transfer constituents from Bridgewood Lake to Hilliard Creek.
  - ii. Groundwater does not potentially transfer constituents from Bridgewood Lake to the Braided Stream.
  - iii. Reservoir outfall (including sediment) does not potentially transfer constituents from Bridgewood Lake to the Braided Stream, nor eventually Hilliard Creek.

As mentioned earlier, the rationale for why it is stated that reservoir outfall ("lake" water and sediments) is not a mode of transport for constituents, generating from Bridgewood Lake, must be provided. In addition, the rationale for why groundwater is not shown as a mode of transport of constituents to the Braided Stream must be provided.

- e. Conceptual Site Model Figure 1 - Similar interpretation of the CSM depiction of Kirkwood Lake requires the following clarification. The rationale for why groundwater and reservoir runoff (both "lake" water and sediments) are not depicted as potential modes of constituent migration, originating from Kirkwood Lake, must be provided.
- f. Conceptual Site Model Figure 1 - In the CSM Legend a "dashed" arrow is used to indicate "Direction of Water Flow During Major Storms"; however, it is difficult to discern whether or not this symbol is depicted on the map. It should be noted that this is an important mode of constituent transfer which may occur, potentially causing both lake water and sediments to be subject to fate transport, and should be factored into the CSM.

#### 4. Residential Sampling

There was no discussion for the inclusion of residential sampling during Phase I of the Implementation Strategy. Residential sampling should be conducted during Phase I activities in accordance with the language of the approved RI/FS Work Plan in its entirety.

#### 5. Background Samples

- a. It is stated within the CSM that Silver Lake, Clement Lake, and Haney run are "background". An explanation of the term background as it is used here should be provided. In addition, it should be noted that there has been no formal discussion for the collection of background samples. It should be clarified whether or not it is intended to do so.
- b. The rationale for why Haney (Honey) Run is indicated as "background" on the CSM should be presented. This statement is contradicted by language on page 3 of the Implementation Plan, where it is stated that Haney Run (along with Hilliard Creek and WSB) represent both transport pathways and receptors for COPCs that are present in the source areas.

#### 6. Proposed Sample Locations

- a. Figures of the intended areas to be sampled with depictions of proposed sampling locations, have been provided by Sherwin-Williams as part of the Implementation Strategy. Utilizing previously collected data (i.e., Sherwin-Williams and their contractors, the NJDEP, and the EPA and their contractors)

the EPA has reviewed and considered the proposed sampling locations and now offers their concurrence, or recommendations (see enclosed figures).

- b. The following figures, which depict areas as well as sampling locations selected by Sherwin-Williams, are approved by EPA as submitted with the Implementation Strategy: Haney Run Brook (Figure 5-3); White Sands Branch (Figure 5-4); Bridgewood Lake (Figure 5-5); and Vacant Lot (Figure 5-8).
- c. The following figures: United States Avenue Burn Site (Figure 5-1); Route 561 Dump Site (Figure 5-2); and the Railroad Site (Figure 5-9) have been submitted with sample locations recommended by the EPA. Note, due to the fact that EPA did not have an electronic copy of Sherwin-Williams Implementation Strategy, we used maps which were taken from the approved RI/FS Workplan. As a result, sample locations previously recommended by Sherwin-Williams are not depicted in manner in which they were on the Implementation Strategy figures.

EPA has used the following color scheme for figures 5-1, 5-2, and 5-9 to translate our comments on the strategic sampling locations submitted by Sherwin-Williams:

Red = sample locations agreed upon by both EPA and Sherwin-Williams

Blue = sample locations recommended by EPA

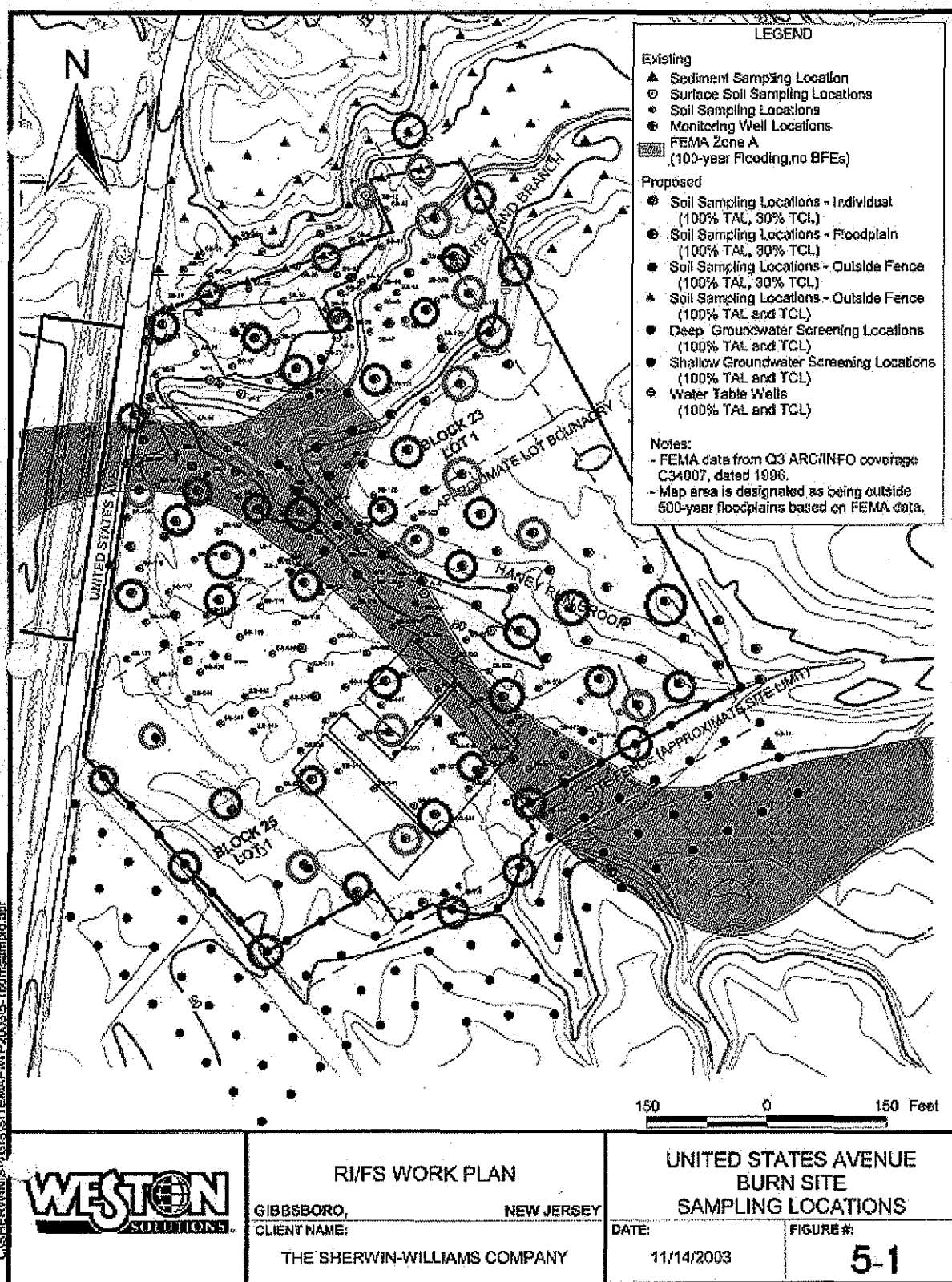
Green = sample locations recommended by Sherwin-Williams

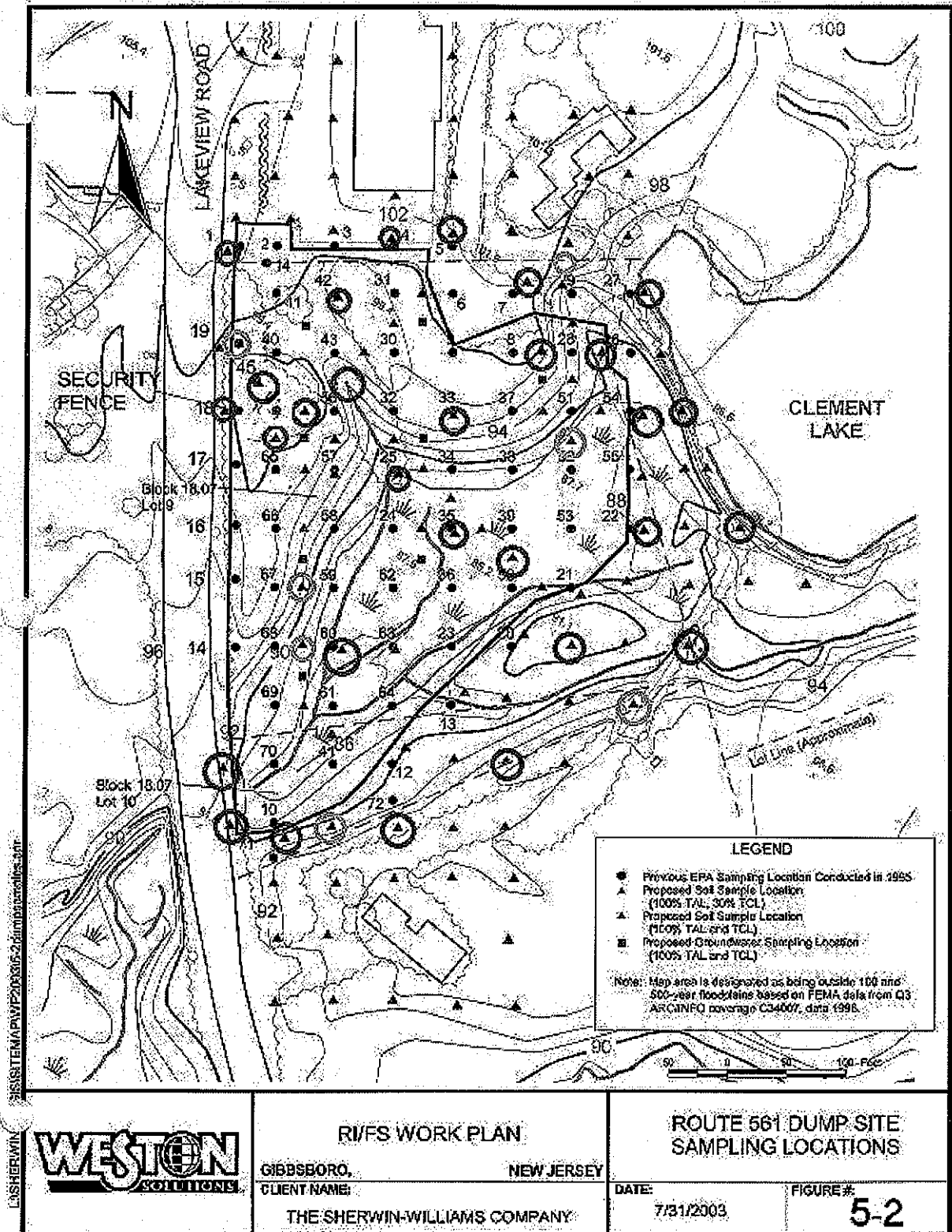
Note: only at the Railroad Site has EPA recommended an increase in the total number of samples previously suggested by Sherwin-Williams. The initial total suggested by Sherwin-Williams was 14, EPA is proposing 17.


- d. Having reviewed Sherwin-Williams's proposal for the sampling of Hilliard Creek (Figure 5-9), EPA recommends that the sampling of Hilliard Creek be performed in accordance to the approved RI/FS Workplan (i.e., every 200 ft.)

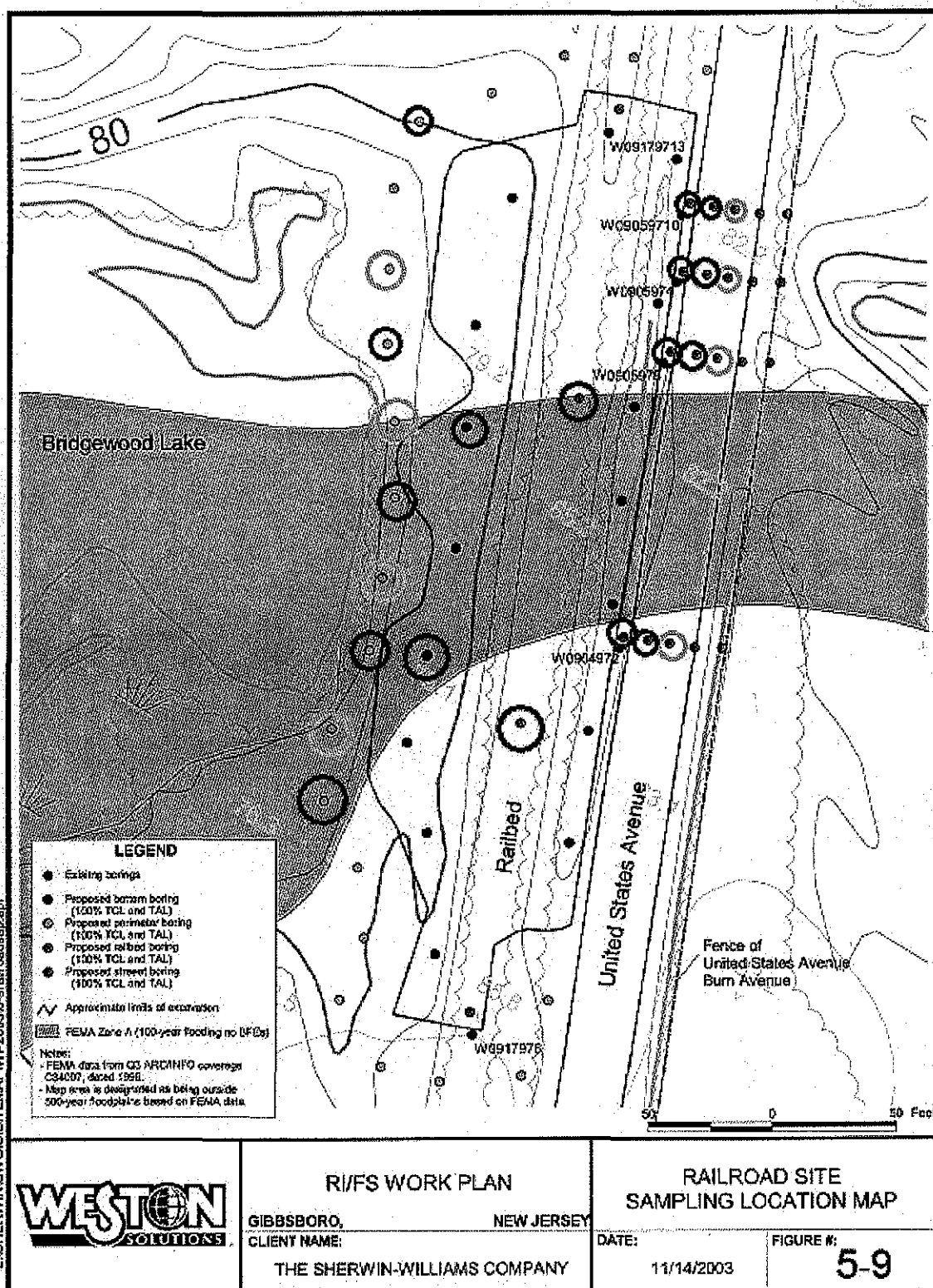
## 7. Project Schedule

After the EPA and Sherwin-Williams have agreed on an approach to implement the Implementation Strategy, it will be required that Section 6.0 and Figure 6-1 (of the approved RI/FS Work Plan) be amended. This is due to the fact that the original sampling and analysis approach did not suggest that the work would be conducted in Phases, thereby reducing the number of samples collected during Phase I.





	R/FS WORK PLAN		ROUTE 561 DUMP SITE SAMPLING LOCATIONS	
	GIBBSBORO, CLIENT NAME:		NEW JERSEY	
	THE SHERWIN-WILLIAMS COMPANY		DATE: 7/31/2003	FIGURE #: 5-2



# ADDITIONAL QUESTIONS/ISSUES (NON-HISTORIC SECTIONS)

## RI/FS DOCUMENT REVISIONS

### GIBBSBORO, NEW JERSEY

JUNE 27, 2003

## SHERWIN-WILLIAMS' RI/FS WORK PLAN - JANUARY 2002

### EPA'S RESPONSE TO COMMENTS RECEIVED FROM

SHERWIN-WILLIAMS ON JULY 9, 2003

DOCUMENT	SECTION	REQUIREMENTS	QUESTIONS/COMMENTS	RESPONSE
Cover Letter	1 <sup>st</sup> page	Specifies total of 9 copies (7 EPA, 2 NJDEP). Consent Order requires 13 (8 EPA, 5 NJDEP).	Please clarify. Would prefer 9 copies since the documents are very expensive to reproduce.	Since this is a final document believe may only need 9 copies of the 13 specified in the Administrative Order on Consent (AOC). If additional copies are needed, we will inform the Sherwin-Williams Company (SWC).
Cover Letter	Item #4	Requires that 100 and 500 year flood plains be added to maps.	FEMA does the mapping based in regional maps and those lines do not much up to our high-resolution mapping. How should we resolve this issue?	If SWC is concerned that the FEMA lines for the 100-year and 500-year floodplains appear to cut across areas of differing elevations, EPA recommends that if SWC knows the elevation for the 100 year and 500 year floodplain that could be utilized with the high-resolution mapping. Otherwise, SWC could take the FEMA lines and "correct" them with more site-specific data. It is our understanding that SWC used Floodprone Maps from NJDEP GIS 1996 to show the 100-year floodplain along Hilliard's Creek for Figure 5-9. Coastal flood data and Digital Elevation Model (DEM) data can be found on the NJDEP GIS url: <a href="http://www.nj.gov/dep/gis">http://www.nj.gov/dep/gis</a> .
Cover letter	Item #10	EPA requests that old EPA borings along the Dump Site fence be shown as proposed for resampling (change red dots to green triangles). Our green triangles were shown as being "couple of feet" away from the old locations, partly for visibility, partly for the fact that even if you could find the exact same spot, you would still not want to sample there, since that very spot has already been disturbed.  Also, why do we need to resample boring 26, if we are taking two more borings on	Should we change those points to another symbol and label them as "previously sampled locations to be resampled" and remove the green triangles that are now next to them? Or is EPA looking for additional samples?	SWC does not need to change the symbol and label on Figure 5-4 of the RI/FS Work Plan, and its duplicate figure specified in the SAP and QAPP. However, the intent of EPA's comment #167(c) in our April 19, 2001 and comment # 10 in our June 6, 2003 letters to SWC was that samples were to be collected along the perimeter of the fence line in close proximity to the previous EPA sample points used for determining where the fence line should be erected to satisfy the Removal AOC. Therefore, upon further review of Figure 5-4, it has been determined that there are three sample points that SWC did not specify on the Figure based on our previous comments. Those sample points are 1, 2, and 10. Please denote a proposed soil sample location in close proximity to each of these points past the current fence line as was done for the other proposed sample points currently noted by SWC on the figure.  Do not need to resample point 26. However, ensure that the proposed soil sample point to the left of sample point 26 is

**ADDITIONAL QUESTIONS/ISSUES (NON-HISTORIC SECTIONS)  
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		<p>either side?</p> <p>If we are sampling 5 but not 6, why should we sample 10 if we are sampling at 71?</p>		<p>taken during the field activities in close proximity to the current fence line.</p> <p>Requesting a proposed sample point in close proximity to sample point 10 to determine if contamination exists south of the current fence line as noted above. The five additional sample points (one of which SWC appears to be denoting as 71 in Figure 5-4 and under the column titled "requirement" to the left) specified along the western perimeter of the fence line along Route 561 were requested by EPA in comment #167(d) in our April 19, 2001 letter to SWC to determine if contamination exists to the west of the current fence line and potentially below the Route 561 roadway. Further, sample points 71 and 10 are approximately 50 feet away from one another which is the grid spacing proposed for soil sampling past the perimeter of the fence line. Therefore, both sampling locations need to be denoted as proposed soil sample locations on Figure 5-4 of the RI/FS Work Plan, and its duplicate figure specified in the SAP and QAPP.</p>
SAP	5.15	Both hazardous and non-hazardous materials will be accumulated on-site for 90 days or less prior to disposal off-site.	Non-hazardous is 120	Sections 5.15 and 1.3.11.7 of the SAP, Section 2.1.10.7 of the QAPP, and Section 5.2.11.7 of the RI/FS Work Plan can be revised to specify that non-hazardous materials will be accumulated on-site for 120 days or less prior to disposal off-site.
SAP	Appendix B	Region 2 low flow does not mention impeller-type pumps.	We want to use variable rate Grundfos pumps.	<p>This is acceptable. However, SWC must follow the purging and sampling procedures stated in the Region 2 Low-Flow SOP (dated March 1998) specified in Appendix B of the SAP. The SOP specifies that SWC must purge at a rate of 200 - 500 ml/min, and collect samples while purging between a rate of 100 - 250 ml/min.</p> <p>While reviewing the SAP to answer SWC's recent round of questions, EPA noted that one item was missing from what needs to be labeled on each of the sample bottles specified under Section 4.2 (Sample Documentation) of the SAP and Section 5.8 (Sample Labeling) of the QAPP. The sample bottle, besides being labeled with the items currently listed in the SAP and QAPP, should also include any preservatives which may be added. This will not only ensure the staff at the lab that they are receiving samples which will be within holding times (by properly being preserved), but also that they may</p>

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				potentially be handling potentially hazardous (after addition of the preservatives) samples. Revise the SAP and QAPP accordingly.
SAP QAP	4.2 5.7.2	Field logbooks will be used for documentation.  Also, we are now planning to use digital cameras versus film.	Is the use of electronic-based entry acceptable? We are now planning to use digital cameras, PDAs and /or laptops to be downloaded to a server every evening.	EPA concerned about making changes in the entries. When using a bound field logbook and indelible ink, it is possible to keep track of any changes to entries as they happen pursuant to the procedures noted in Section 4.2 of the SAP and Section 5.7.2 of the QAPP. It is unclear how those procedures will be met using electronic means. SWC will need to add language to Section 4.2 of the SAP and Section 5.7.2 of the QAPP to specify how the procedures used to ensure the integrity of entries into the logbooks will be implemented using electronic means. Section 4.2.3 of the SAP specifies that digital cameras may be used.
SAP	Appendix B	Region 2 low flow spec	We may be using PDAs/iPAQs.	Understand that SWC may be using PDAs/iPAQs. Refer to our response above to SWC's questions on Section 4.2 of the SAP and Section 5.7.2 of the QAPP.

TOPIC	ITEM	SECTION(s)	SWC's COMMENT	6/19/03 MEETING OUTCOME / ACTION ITEM	RESOLUTION
			sampling.		
Sampling Depths	12	5.2.2.2, 5.2.3.2, 5.2.4.4, 5.2.5.4, 5.2.6.2, 5.2.6.4, 5.2.7.4, 5.2.8.2	Depth of surface soil samples. Work Plan calls for all parameters collected 0 to 6" bgs except for VOCs collected from 18"-24".	Mike Sivak to contact TRW and discuss if 0-6" can be used at this site for residential lead risk assessment (since it is being conducted along with other contaminants of potential concern). Other issues to be discussed will be to determine if 0-6" is agreeable for non-residential areas, and if sieving of the soil (again, for a comprehensive risk assessment, not just lead) is required, and if 18-24" samples for VOCs can be used for the risk assessment.	<p>(a) SWC should implement the sampling scheme as specified in the current EPA edited version of the RI/FS Work Plan. In addition to what is already required in the RI/FS Work Plan, SWC may conduct the following additional sampling at residential properties:</p> <ol style="list-style-type: none"> <li>1. Grab discreet XRF lead samples (do not composite), at an interval of 0-1" bgs, from 10 of the 15 soil traverse borehole locations per residential property currently proposed in the RI/FS Work Plan.</li> <li>2. Only the 10 XRF lead samples per residential property being collected from 0-1" bgs may be sieved.</li> </ol> <p>(b) 0-6" can be used at this site for the residential risk assessment. Once the data has been collected for this first phase of the RI/FS, EPA will compare both sample horizons (0-1" and 1-6") to determine if the 0-1" depth can be eliminated.</p> <p>(c) With respect to a question regarding if the sampling interval 0-6" is agreeable for non-residential areas, and a question regarding if the sampling interval 18-24" for VOCs can be used for the risk assessment. Sampling for non-residential areas will be conducted as specified in the current EPA edited version of the RI/FS Work Plan and 18-24" samples for VOCs can be used for the risk assessment.</p>
Residential Sampling	13	5.2.7.4	Sherwin-Williams would like to discuss the residential sampling approach to insure that, characterization, risk assessment and delineation goals will be met.	Mike to review NJDEP's criteria (which will serve as ARARs for this site), which do not allow for composite sampling - in light of the requirement by the TRW to conduct composite sampling for residential lead risk assessments (i.e.,	Composite sampling shall not be conducted pursuant to N.J.A.C. 7:26E-3.4 which is an ARAR for the Sites. With respect to the residential sampling approach, EPA recommends that SWC speak to the residents prior to sampling to ensure that the residents have not moved sediment or soil from within the 100-year flood plain to another portion of their property. If so, some of the sampling points may need to be re-located, or additional sample points specified, to characterize those areas outside of the 100-year flood plain that may potentially be contaminated.

TOPIC	ITEM	SECTION(s)	SWC's COMMENT	6/19/03 MEETING OUTCOME / ACTION ITEM	RESOLUTION
				how can we resolve these 2 conflicting requirements).	
Miscellaneous	17	5.2.2.3	Sherwin-Williams proposes to change the reference to the Braddock residence to the street address of the residence (25 United States Avenue).	Reference to 'Braddock' will be removed from work plan. EPA to determine if address should be included in the work plan.	Address should be included in the RI/FS Work Plan. Addresses will be redacted from the copies of the RI/FS Work Plan that will be placed in the public repositories.